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Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue, Pittsfield, MA 01201

Transmitted Via Overnight Delivery

December 15, 2004

Mr. William P. Lovely, Jr.
U.S. Environmental Protection Agency
EPA New England (MC HBO)
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
Floodplain Residential and Non-Residential Properties Adjacent to
1½ Mile Reach of Housatonic River (GECD710 and GECD720)
Proposal for Non-PCB Pre-Design Investigations – Phase 4 Floodplain Properties,
Group 4A – Parcel I7-1-101**

Dear Mr. Lovely:

On July 14, 2004, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Work Plan Addendum – Phase 4 Floodplain Properties, Group 4A* (Work Plan Addendum), which presented the proposed pre-design soil investigations for polychlorinated biphenyls (PCBs) to be conducted at the properties within Phase 4, Group 4A of the floodplain residential and non-residential properties adjacent to the 1½ Mile Reach of the Housatonic River (1½ Mile floodplain properties). Those properties are shown on Figure 1. The Work Plan Addendum was conditionally approved by EPA in a letter to GE dated December 3, 2004. Condition Number 4 of EPA's conditional approval letter required GE to provide a sampling proposal for non-PCB constituents listed in Appendix IX of 40 CFR Part 264 plus three additional constituents (benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine) (Appendix IX+3) at one of these properties – Parcel I7-1-101 (Fred Garner Park) – within 15 days of the date of that letter. Accordingly, GE has developed this Proposal for Non-PCB Investigations to describe the proposed scope of non-PCB investigations at that property. In addition, this proposal identifies the proposed evaluation areas (also known as averaging areas) at Parcel I7-1-101 that will be subject to future Removal Design/Removal Action (RD/RA) evaluations.

1. RD/RA Evaluation Areas

Condition Number 2 of EPA's December 3, 2004 conditional approval letter requires that Parcel I7-1-101 be divided into two separate evaluation (averaging) areas. These evaluation areas were shown on a figure that EPA provided to GE on November 16, 2004. Figures 2 and 3 attached to this letter illustrate the two evaluation areas specified by EPA. In addition, in accordance with Condition Number 1 of EPA's December 3, 2004 conditional approval letter, Figures 2 and 3 have been revised to include the revised top-of-bank boundary provided to GE by EPA on November 10, 2004.

2. Proposed Non-PCB Soil Investigations

As indicated in EPA's conditional approval letter and confirmed by GE's preliminary review of the existing PCB data within Group 4A (shown on Figure 2), it appears that remediation actions will be necessary to address PCBs at Parcel I7-1-101, and specifically within each of the two evaluation areas

located within that property. Accordingly, GE is proposing to conduct non-PCB soil sampling and analysis activities to support future RD/RA activities for each of those evaluation areas. These activities will involve the collection of 35 soil samples from 13 locations, as shown on Figure 3. Of these proposed samples, 13 will be surface samples (0- to 1-foot depth) and 22 will be collected from subsurface soils. Similar to the PCB investigations described in the Work Plan Addendum, subsurface soil samples will be collected from 1- to 3-foot, 3- to 6-foot, 6- to 10-foot, and 10- to 15-foot depth increments, as shown in Table 1. Analyses of the subsurface soil samples for non-PCB constituents will be conducted in an iterative manner, with those samples located between 1 and 6 feet (12 of the 22 subsurface samples) subject to initial analysis. Analysis of the samples collected from deeper increments will be contingent on the results of the PCB investigations presented in the Work Plan Addendum. For example, if the PCB results for the 3- to 6-foot depth increment at an evaluation area do not define the vertical extent of PCBs, then all of the PCB and non-PCB samples collected from the 6- to 10-foot depth increment within that evaluation area will be analyzed.

GE proposes to analyze the non-PCB samples for Appendix IX+3 semivolatile organic compounds (SVOCs), inorganics, and polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (PCDDs/PCDFs). Based on a review of the existing Appendix IX+3 data from Group 4A provided in Tables 2 and 3, and consistent with the Appendix IX+3 sampling and analysis performed at the Phase 3 floodplain properties, analysis of these samples for volatile organic compounds (VOCs), pesticides, or herbicides is not warranted.

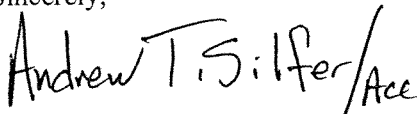
It should also be noted that preliminary review of the existing data from the Group 4A properties indicates that remediation actions will likely not be required to address PCBs at the other Group 4A properties – Parcels I7-1-2 and I7-1-5. Therefore, consistent with the *Statement of Work for Removal Actions Outside the River* (pp. 69-70) and the EPA-approved approach for such properties in Phases 1 and 2 of the 1½ Mile floodplain properties, GE is not proposing sampling and analysis for non-PCB constituents within these parcels.

3. Future Activities and Proposed Schedule

In accordance with EPA's December 3, 2004 conditional approval letter, GE will initiate the sampling described in this proposal following receipt of approval from EPA, and will submit a Pre-Design Investigation Report (PDI Report) within three months of the date of EPA's approval of this proposal. The PDI Report will include the results of the PCB investigations specified in the Work Plan Addendum and the non-PCB investigations proposed herein. This schedule is subject to revision if weather conditions preclude the timely completion of the sampling or if EPA's activities relating to the 1½ Mile Reach Removal Action preclude the collection of the samples at the designated locations.

Please contact Dick Gates or me with any questions.

Sincerely,



Andrew T. Silfer, P.E.
GE Project Coordinator

Attachments

V:\GE_Housatonic_Mile_and_Half\Reports and Presentations\Phase 4 Group 4A\75642196.doc

cc: Dean Tagliaferro, EPA
Rose Howell, EPA*
Holly Inglis, EPA
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Jeffrey Bernstein, Bernstein, Cushner & Kimmell
Teresa Bowers, Gradient
Michael Carroll, GE*
Richard Gates, GE
Rod McLaren, GE*
James Nuss, BBL
James Bieke, Goodwin Procter
Public Information Repositories
GE Internal Repository

** cover letter only*

Tables

TABLE 1
SUMMARY OF PROPOSED NON-PCB SAMPLING LOCATIONS AND ASSOCIATED DEPTH INTERVALS

PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

SAMPLE ID	DEPTH INCREMENT (FEET)				
	0-1	1-3	3-6	6-10	10-15
PARCEL I7-1-101					
4A-SB-3	X	--	X	Y	--
4A-SB-5	X	X	--	--	--
4A-SB-6	X	--	X	--	Y
4A-SB-12	X	X	--	Y	--
4A-SB-13	X	X	--	--	--
4A-SB-14	X	--	X	--	Y
4A-SB-15	X	--	X	--	Y
4A-SB-16	X	--	X	Y	--
4A-SB-17	X	X	--	Y	--
4A-SB-20	X	X	--	--	Y
4A-SB-21	X	--	X	--	Y
4A-SB-23	X	X	--	Y	--
4A-SS-19	X	--	--	--	--

Notes:

1. X - Indicates proposed sampling depth for samples to be analyzed for SVOCs, inorganics, and PCDDs/PCDFs.
2. Y - Indicates proposed sampling depth for samples to be held for possible future analysis of above constituents.
3. -- = No sample proposed for collection.
4. Proposed sample locations are shown on Figure 3.

TABLE 2
GE PRIOR APPENDIX IX + 3 SOIL DATA - GROUP 4A

PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Location ID: RB022041	
Sample ID: H2-RB022041-0-0010	
Sample Depth(Feet): 1-1.5	
Date Collected: 10/22/98	
Parameter	
Volatile Organics	
None Detected	--
Semivolatile Organics	
Benzo(a)anthracene	0.10 J
Benzo(a)pyrene	0.099 J
Benzo(b)fluoranthene	0.098 J
Benzo(g,h,i)perylene	0.060 J
Benzo(k)fluoranthene	0.054 J
Chrysene	0.10 J
Fluoranthene	0.15 J
Indeno(1,2,3-cd)pyrene	0.059 J
Phenanthrene	0.080 J
Pyrene	0.19 J
Furans	
2,3,7,8-TCDF	0.000012 Y
TCDFs (total)	0.000061
1,2,3,7,8-PeCDF	0.0000055 J
2,3,4,7,8-PeCDF	0.0000077
PeCDFs (total)	0.000064
1,2,3,4,7,8-HxCDF	0.000010
1,2,3,6,7,8-HxCDF	0.0000057 J
1,2,3,7,8,9-HxCDF	ND(0.00000022)
2,3,4,6,7,8-HxCDF	ND(0.00000023)
HxCDFs (total)	0.000041
1,2,3,4,6,7,8-HpCDF	0.000022
1,2,3,4,7,8,9-HpCDF	0.0000037 J
HpCDFs (total)	0.000048
OCDF	0.000034
Total Furans	0.00025
Dioxins	
2,3,7,8-TCDD	ND(0.00000052)
TCDDs (total)	0.0000062
1,2,3,7,8-PeCDD	ND(0.00000030)
PeCDDs (total)	ND(0.0000017)
1,2,3,4,7,8-HxCDD	ND(0.00000052)
1,2,3,6,7,8-HxCDD	ND(0.0000010)
1,2,3,7,8,9-HxCDD	ND(0.00000088)
HxCDDs (total)	0.000040
1,2,3,4,6,7,8-HpCDD	0.000018
HpCDDs (total)	0.000035
OCDD	0.00017
Total Dioxins	0.00021
Total TEQs (MDEP TEFs)	0.000018
Total TEQs (WHO TEFs)	0.00000741
Total TEQs (EPA TEFs)	0.0000076
Inorganics	
Arsenic	5.30
Barium	30.6
Beryllium	0.350 B
Cadmium	0.420 B
Chromium	13.3
Cobalt	15.4
Copper	18.4
Lead	14.7
Mercury	0.0570 B
Nickel	22.2
Selenium	0.540 B
Thallium	1.90
Vanadium	16.8
Zinc	69.2

TABLE 2
GE PRIOR APPENDIX IX + 3 SOIL DATA - GROUP 4A

PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Notes:

1. Samples were submitted to Quanterra Environmental Services, Inc. for analysis of Appendix IX+3 constituents.
2. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
3. With the exception of dioxin/furans, only detected constituents are summarized.
4. Total 2,3,7,8-TCDD toxicity equivalents (TEQs) were calculated using Toxicity Equivalency Factors (TEFs) derived by the World Health Organization (WHO) and published by Van den Berg et al. in Environmental Health Perspectives 106(2), December 1998.
5. -- Indicates that all constituents for the parameter group were not detected.

Data Qualifiers:

Organics (volatiles, semivolatiles, dioxin/furans)

J - Indicates that the associated numerical value is an estimated concentration.

Y - 2,3,7,8-TCDF results have been confirmed on a DB-225 column.

Inorganics

B - Indicates an estimated value between the instrument detection limit (IDL) and practical quantitation limit (PQL).

TABLE 3
EPA PRIOR APPENDIX IX SOIL DATA - GROUP 4A

PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Location ID: Sample ID: Sample Depth(Feet): Date Collected:	F0218802 H2-F0218802-0-0000 0-0.5 11/10/98	F0219004 H2-F0219004-0-0000 0-0.5 11/11/98	F0219006 H2-F0219006-0-0000 0-0.5 11/11/98
Semivolatile Organics			
1,2,4-Trichlorobenzene	0.10 J	0.032 J	0.031 J
1,4-Dichlorobenzene	0.12 J	ND(0.46)	0.027 J
2-Methylnaphthalene	0.18 J	ND(0.46)	0.23 J
2-Methylphenol	ND(0.91)	ND(0.93)	ND(0.93)
4-Methylphenol	0.043 J	0.031 J	0.042 J
Acenaphthene	0.19 J	0.058 J	0.073 J
Acenaphthylene	0.21 J	0.16 J	0.12 J
Anthracene	0.77 J	0.28 J	0.25 J
Benzo(a)anthracene	3.9	2.2	2.0
Benzo(a)pyrene	3.6 J	2.7 J	2.6 J
Benzo(b)fluoranthene	2.5 J	2.4 J	1.9 J
Benzo(g,h,i)perylene	2.5 J	3.2 J	2.6 J
Benzo(k)fluoranthene	3.2 J	2.4 J	2.3 J
Benzyl Alcohol	ND(0.91) J	ND(0.93)	ND(0.93)
Chrysene	3.7 J	2.7 J	2.5 J
Dibenzo(a,h)anthracene	0.65 J	0.88 J	0.76 J
Dibenzofuran	0.15 J	0.076 J	0.077 J
Fluoranthene	5.7 J	3.3 J	4.0 J
Fluorene	0.28 J	0.082 J	0.11 J
Indeno(1,2,3-cd)pyrene	2.4 J	3.1 J	2.5 J
Naphthalene	0.52 J	0.28 J	0.38 J
Phenanthrene	2.7 J	1.3 J	1.5 J
Phenol	ND(0.91)	ND(0.93)	ND(0.93)
Pyrene	6.8 J	3.8 J	5.9 J
Organochlorine Pesticides			
None Detected	--	--	--
Organophosphate Pesticides			
None Detected	NA	NA	NA
Herbicides			
None Detected	--	--	--
Furans			
2,3,7,8-TCDF	0.000066	0.0000096	0.000032
TCDFs (total)	0.0064	0.00047 J	0.0017 J
1,2,3,7,8-PeCDF	0.000068	0.000011	0.000026
2,3,4,7,8-PeCDF	0.000086	0.000013	0.000038
PeCDFs (total)	0.014	0.00081 J	0.0022 J
1,2,3,4,7,8-HxCDF	0.00020	0.000018	0.000055
1,2,3,6,7,8-HxCDF	0.000065	0.0000069	0.00034
1,2,3,7,8,9-HxCDF	0.000031	0.0000037	0.000010
2,3,4,6,7,8-HxCDF	0.000095	0.0000076	0.000030
HxCDFs (total)	0.011	0.00087 J	0.0012 J
1,2,3,4,6,7,8-HpCDF	0.0012	0.00014 J	0.00032 J
1,2,3,4,7,8,9-HpCDF	0.000099	0.0000082	0.000023
HpCDFs (total)	0.0017	0.00023 J	0.00061 J
OCDF	0.00072	0.000062	0.00020
Dioxins			
2,3,7,8-TCDD	0.000023	0.00000074	0.0000014
TCDDs (total)	0.000088	0.0000074	0.000019
1,2,3,7,8-PeCDD	0.000021	0.0000018 J	0.0000042
PeCDDs (total)	0.00024	0.000019	0.000030
1,2,3,4,7,8-HxCDD	0.000026	0.0000023 J	0.0000065
1,2,3,6,7,8-HxCDD	0.000042	0.0000040	0.000011
1,2,3,7,8,9-HxCDD	0.000030	0.0000028	0.0000080
HxCDDs (total)	0.00057	0.000054	0.00014
1,2,3,4,6,7,8-HpCDD	0.00033	0.000038	0.00012
HpCDDs (total)	0.00065	0.000075	0.00024
OCDD	0.0020	0.00026	0.00082
Total TEQs (WHO TEFs)	0.00016	0.000017	0.000080

TABLE 3
EPA PRIOR APPENDIX IX SOIL DATA - GROUP 4A

PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Location ID:	F0218802	F0219004	F0219006
Sample ID:	H2-F0218802-0-0000	H2-F0219004-0-0000	H2-F0219006-0-0000
Sample Depth(Feet):	0-0.5	0-0.5	0-0.5
Date Collected:	11/10/98	11/11/98	11/11/98
Parameter			
Inorganics			
Antimony	0.770 J	0.900 J	1.00 J
Arsenic	4.10	29.0	45.4
Barium	40.2	72.2	67.6
Beryllium	0.180 J	0.350 J	0.120 J
Cadmium	0.160 J	ND(0.0300)	ND(0.0300)
Chromium	17.6	15.5	22.9
Cobalt	7.60	10.6	13.7
Copper	42.3 J	53.4 J	60.4 J
Lead	81.9 J	163 J	231 J
Mercury	0.170	0.590	0.770
Nickel	37.2	19.7	25.0
Selenium	0.530 J	1.60	0.900
Silver	ND(0.130)	0.480 J	0.750 J
Thallium	ND(0.560)	ND(0.510)	0.950 J
Tin	7.60	7.00	8.50
Vanadium	12.1	21.9	22.8
Zinc	161 J	164 J	179 J

TABLE 3
EPA PRIOR APPENDIX IX SOIL DATA - GROUP 4A

**PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)**

Location ID:	F0219203	F0219407	F0220201
Sample ID:	H2-F0219203-0-0000	H2-F0219407-0-0010	H2-F0220201-0-0000
Sample Depth(Feet):	0-0.5	1-1.5	0-0.5
Date Collected:	11/12/98	11/12/98	11/13/98
Parameter			
Semivolatile Organics			
1,2,4-Trichlorobenzene	ND(0.41)	0.028 J	ND(0.40)
1,4-Dichlorobenzene	ND(0.41)	0.046 J	ND(0.40)
2-Methylnaphthalene	0.022 J	0.066 J	ND(0.40) J
2-Methylphenol	R	R	ND(0.40)
4-Methylphenol	R	R	ND(0.40)
Acenaphthene	ND(0.41)	0.034 J	ND(0.40)
Acenaphthylene	0.056 J	0.088 J	ND(0.40)
Anthracene	0.071 J	0.11 J	ND(0.40)
Benzo(a)anthracene	1.4	0.67	0.039 J
Benzo(a)pyrene	1.5	0.82	0.051 J
Benzo(b)fluoranthene	1.2	0.52	0.050 J
Benzo(g,h,i)perylene	1.2 J	0.64 J	0.049 J
Benzo(k)fluoranthene	1.4	0.75	0.056 J
Benzyl Alcohol	0.082 J	R	ND(0.40) J
Chrysene	1.5	0.77	0.062 J
Dibenzo(a,h)anthracene	0.40 J	0.20 J	ND(0.40) J
Dibenzofuran	ND(0.41)	0.027 J	ND(0.40)
Fluoranthene	2.2	0.85	0.076 J
Fluorene	0.019 J	0.039 J	ND(0.40)
Indeno(1,2,3-cd)pyrene	1.2 J	0.56 J	0.046 J
Naphthalene	0.038 J	0.14 J	ND(0.40)
Phenanthrene	0.38 J	0.43	0.047 J
Phenol	R	R	ND(0.40)
Pyrene	3.1 J	0.95 J	0.084 J
Organochlorine Pesticides			
None Detected	--	--	--
Organophosphate Pesticides			
None Detected	NA	NA	--
Herbicides			
None Detected	--	--	--
Furans			
2,3,7,8-TCDF	0.0000045	0.000017	0.000021
TCDFs (total)	0.000054 J	0.00043 J	0.00017 J
1,2,3,7,8-PeCDF	0.0000025	0.0000082	0.0000049
2,3,4,7,8-PeCDF	0.0000034	0.000016	0.0000067
PeCDFs (total)	0.000082 J	0.0012 J	0.000084 J
1,2,3,4,7,8-HxCDF	0.0000048	0.000026	0.0000041
1,2,3,6,7,8-HxCDF	0.0000022 J	0.0000078	0.0000042
1,2,3,7,8,9-HxCDF	0.0000089 J	0.0000044	0.0000064 J
2,3,4,6,7,8-HxCDF	0.0000028	0.000012	0.0000027
HxCDFs (total)	0.00010 J	0.00065 J	0.000047 J
1,2,3,4,6,7,8-HpCDF	0.000032 J	0.00011 J	0.000018 J
1,2,3,4,7,8,9-HpCDF	0.0000020 J	0.000013	0.0000011 J
HpCDFs (total)	0.000058 J	0.00025 J	0.000034 J
OCDF	0.000019	0.000085	0.000020
Dioxins			
2,3,7,8-TCDD	0.0000036 J	0.0000065	ND(0.0000034)
TCDDs (total)	0.0000014	0.000014	0.0000037
1,2,3,7,8-PeCDD	0.00000041 J	0.0000024 J	0.00000041 J
PeCDDs (total)	0.0000023 J	0.000024	0.0000047
1,2,3,4,7,8-HxCDD	0.00000060 J	0.0000028	0.00000055 J
1,2,3,6,7,8-HxCDD	0.0000011 J	0.0000042	0.00000094 J
1,2,3,7,8,9-HxCDD	0.00000087 J	0.0000028	0.00000066 J
HxCDDs (total)	0.000011	0.000053	0.0000094
1,2,3,4,6,7,8-HpCDD	0.000015	0.000039	0.000012
HpCDDs (total)	0.000027	0.000076	0.000022
OCDD	0.000096	0.00025	0.000094
Total TEQs (WHO TEFs)	0.0000049	0.000027	0.0000080

TABLE 3
EPA PRIOR APPENDIX IX SOIL DATA - GROUP 4A

PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Location ID:	F0219203	F0219407	F0220201
Sample ID:	H2-F0219203-0-0000	H2-F0219407-0-0010	H2-F0220201-0-0000
Sample Depth(Feet):	0-0.5	1-1.5	0-0.5
Date Collected:	11/12/98	11/12/98	11/13/98
Parameter			
Inorganics			
Antimony	ND(0.670)	ND(0.760)	ND(0.740)
Arsenic	35.6	2.60	8.40
Barium	26.2	36.9	47.2
Beryllium	ND(0.0700)	0.160 J	ND(0.0100)
Cadmium	1.00	0.650	0.810
Chromium	11.2	9.70	7.30
Cobalt	11.5	7.40	13.3
Copper	20.4	21.1	25.3
Lead	101	27.6	28.8
Mercury	0.100	0.0700	0.0700
Nickel	17.5	10.9	17.2
Selenium	0.860	0.480 J	0.960
Silver	0.150 J	ND(0.120)	ND(0.110)
Thallium	ND(0.450)	0.570 J	ND(0.490)
Tin	1.10 J	2.90	0.700 J
Vanadium	12.7	9.70	10.2
Zinc	79.4	65.6	54.3

TABLE 3
EPA PRIOR APPENDIX IX SOIL DATA - GROUP 4A

PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Location ID: Sample ID: Sample Depth(Feet): Date Collected:	F0220603 H2-F0220603-0-0000 0-0.5 11/13/98	F0321001 H2-F0321001-0-0010 1-1.5 11/16/98	RB022041 H2-RB022041-0-0010 1-1.5 10/22/98
Semivolatile Organics			
1,2,4-Trichlorobenzene	0.025 J	0.085 J	ND(0.38) J
1,4-Dichlorobenzene	0.020 J	0.087 J	ND(0.38)
2-Methylnaphthalene	0.038 J	0.40 J	ND(0.38)
2-Methylphenol	R	0.046 J	ND(0.38)
4-Methylphenol	R	0.12 J	R
Acenaphthene	0.018 J	0.15 J	ND(0.38)
Acenaphthylene	0.037 J	0.85 J	ND(0.38) J
Anthracene	0.064 J	0.58 J	ND(0.38) J
Benzo(a)anthracene	0.61	2.9	0.064 J
Benzo(a)pyrene	0.72	3.6 J	0.053 J
Benzo(b)fluoranthene	0.60	3.2	0.050 J
Benzo(g,h,i)perylene	0.52 J	3.0	0.045 J
Benzo(k)fluoranthene	0.62	3.3	0.064 J
Benzyl Alcohol	R	ND(0.81)	ND(0.38) J
Chrysene	0.68	3.5	0.068 J
Dibenzo(a,h)anthracene	0.15 J	0.71 J	0.023 J
Dibenzofuran	0.021 J	0.14 J	ND(0.38)
Fluoranthene	0.87	4.4	0.10 J
Fluorene	0.022 J	0.18 J	ND(0.38)
Indeno(1,2,3-cd)pyrene	0.50 J	2.1	0.041 J
Naphthalene	0.11 J	0.67 J	ND(0.38)
Phenanthrene	0.32 J	2.3	0.059 J
Phenol	R	0.28 J	ND(0.38)
Pyrene	0.95 J	5.0	0.12 J
Organochlorine Pesticides			
None Detected	--	--	--
Organophosphate Pesticides			
None Detected	NA	--	--
Herbicides			
None Detected	--	--	--
Furans			
2,3,7,8-TCDF	0.000014	0.00018	0.0000093
TCDFs (total)	0.00034 J	0.0039 J	0.000076 J
1,2,3,7,8-PeCDF	0.0000080	0.00021	0.0000055
2,3,4,7,8-PeCDF	0.000013	0.00029	0.0000093
PeCDFs (total)	0.00055 J	0.0074 J	0.00011 J
1,2,3,4,7,8-HxCDF	0.000026	0.00052	0.000011
1,2,3,6,7,8-HxCDF	0.00014	0.00027 J	0.0000045
1,2,3,7,8,9-HxCDF	0.0000047	0.00012	0.0000020
2,3,4,6,7,8-HxCDF	0.000011	0.00017 J	0.0000035 J
HxCDFs (total)	0.00055 J	0.0053 J	0.00010 J
1,2,3,4,6,7,8-HpCDF	0.00017 J	0.0025 J	0.000086 J
1,2,3,4,7,8,9-HpCDF	0.000012	0.00019	0.0000050
HpCDFs (total)	0.00040 J	0.0045 J	0.00016 J
OCDF	0.00023	0.0015	0.000066
Dioxins			
2,3,7,8-TCDD	0.000016	0.0000049	0.00000061
TCDDs (total)	0.000026	0.000083	0.0000021
1,2,3,7,8-PeCDD	0.0000024 J	0.000021 J	0.00000038 J
PeCDDs (total)	0.000022	0.00023 J	0.0000041 J
1,2,3,4,7,8-HxCDD	0.0000034	0.000024	0.00000055 J
1,2,3,6,7,8-HxCDD	0.0000074	0.000055	0.0000011
1,2,3,7,8,9-HxCDD	0.0000042	0.000027	0.00000054 J
HxCDDs (total)	0.000078	0.00060	0.000010
1,2,3,4,6,7,8-HpCDD	0.000096	0.00059	0.000020
HpCDDs (total)	0.00016	0.0011	0.000035
OCDD	0.00063	0.0046	0.00017
Total TEQs (WHO TEFs)	0.000049	0.00035	0.000010

TABLE 3
EPA PRIOR APPENDIX IX SOIL DATA - GROUP 4A

PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Location ID:	F0220603	F0321001	RB022041
Sample ID:	H2-F0220603-0-0000	H2-F0321001-0-0010	H2-RB022041-0-0010
Sample Depth(Feet):	0-0.5	1-1.5	1-1.5
Parameter Date Collected:	11/13/98	11/16/98	10/22/98
Inorganics			
Antimony	ND(0.680)	2.10	ND(0.610)
Arsenic	6.20	7.90	6.10
Barium	30.5	76.5	26.7
Beryllium	ND(0.0500)	0.390	0.170
Cadmium	0.960	ND(1.20)	ND(0.0300)
Chromium	10.0	114	11.1
Cobalt	9.50	10.3	10.2
Copper	25.9	188	17.3
Lead	49.8	329	14.6
Mercury	0.120	0.890	0.0600
Nickel	16.6	21.4 J	15.3
Selenium	0.680	ND(0.590)	0.370 J
Silver	0.140 J	ND(0.680)	ND(0.120)
Thallium	ND(0.450)	ND(0.670)	ND(0.520)
Tin	2.20	27.2	ND(1.40)
Vanadium	12.4	15.3	13.1
Zinc	76.5	314	57.7

TABLE 3
EPA PRIOR APPENDIX IX SOIL DATA - GROUP 4A

PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Location ID:		RB032121
Sample ID:		H2-RB032121-0-0000
Sample Depth(Feet):		0-0.5
Parameter	Date Collected:	10/19/98
Semivolatile Organics		
1,2,4-Trichlorobenzene	0.056 J	
1,4-Dichlorobenzene	0.097 J	
2-Methylnaphthalene	0.16 J	
2-Methylphenol	ND(0.80)	
4-Methylphenol	ND(0.80)	
Acenaphthene	0.24 J	
Acenaphthylene	0.11 J	
Anthracene	0.99	
Benzo(a)anthracene	2.3	
Benzo(a)pyrene	1.8	
Benzo(b)fluoranthene	1.5	
Benzo(g,h,i)perylene	0.83	
Benzo(k)fluoranthene	1.7	
Benzyl Alcohol	ND(0.80) J	
Chrysene	2.0	
Dibenzo(a,h)anthracene	0.32 J	
Dibenzofuran	0.19 J	
Fluoranthene	4.2 J	
Fluorene	0.50 J	
Indeno(1,2,3-cd)pyrene	0.90	
Naphthalene	0.35 J	
Phenanthrene	3.3	
Phenol	ND(0.80)	
Pyrene	4.0	
Organochlorine Pesticides		
None Detected	--	
Organophosphate Pesticides		
None Detected	NA	
Herbicides		
None Detected	--	
Furans		
2,3,7,8-TCDF	0.000016	
TCDFs (total)	0.00019 J	
1,2,3,7,8-PeCDF	0.0000084	
2,3,4,7,8-PeCDF	0.000016	
PeCDFs (total)	0.00029 J	
1,2,3,4,7,8-HxCDF	0.000021	
1,2,3,6,7,8-HxCDF	0.0000075	
1,2,3,7,8,9-HxCDF	0.0000033	
2,3,4,6,7,8-HxCDF	0.0000044	
HxCDFs (total)	0.00023	
1,2,3,4,6,7,8-HpCDF	0.00012	
1,2,3,4,7,8,9-HpCDF	0.0000096	
HpCDFs (total)	0.00023	
OCDF	0.00012	
Dioxins		
2,3,7,8-TCDD	0.00000047 J	
TCDDs (total)	0.0000060	
1,2,3,7,8-PeCDD	0.00000088 J	
PeCDDs (total)	0.0000071 J	
1,2,3,4,7,8-HxCDD	0.0000011 J	
1,2,3,6,7,8-HxCDD	0.0000039	
1,2,3,7,8,9-HxCDD	0.0000017	
HxCDDs (total)	0.000031	
1,2,3,4,6,7,8-HpCDD	0.000077	
HpCDDs (total)	0.00014	
OCDD	0.00074	
Total TEQs (WHO TEFs)	0.000018	

TABLE 3
EPA PRIOR APPENDIX IX SOIL DATA - GROUP 4A

PROPOSAL FOR NON-PCB PRE-DESIGN INVESTIGATIONS - PHASE 4 FLOODPLAIN PROPERTIES, GROUP 4A
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Location ID:		RB032121
Sample ID:		H2-RB032121-0-0000
Sample Depth(Feet):		0-0.5
Date Collected:		10/19/98
Parameter		
Inorganics		
Antimony		0.660
Arsenic		2.90
Barium		34.2
Beryllium		0.250
Cadmium		ND(0.170)
Chromium		13.6
Cobalt		6.30
Copper		22.2
Lead		31.7
Mercury		0.0800
Nickel		11.8
Selenium		ND(0.210)
Silver		ND(0.510)
Thallium		ND(0.740)
Tin		ND(1.50)
Vanadium		10.2
Zinc		72.3

Notes:

1. Sample collection and analysis performed by United States Environmental Protection Agency (EPA) Subcontractors. Results provided to GE under a Data Exchange Agreement between GE and EPA.
2. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
3. With the exception of dioxin/furans, only those constituents detected in at least one sample are summarized.
4. Total 2,3,7,8-TCDD toxicity equivalents (TEQs) were calculated using Toxicity Equivalency Factors (TEFs) derived by the World Health Organization (WHO) and published by Van den Berg et al. in Environmental Health Perspectives 106(2), December 1998.

Data Qualifiers:

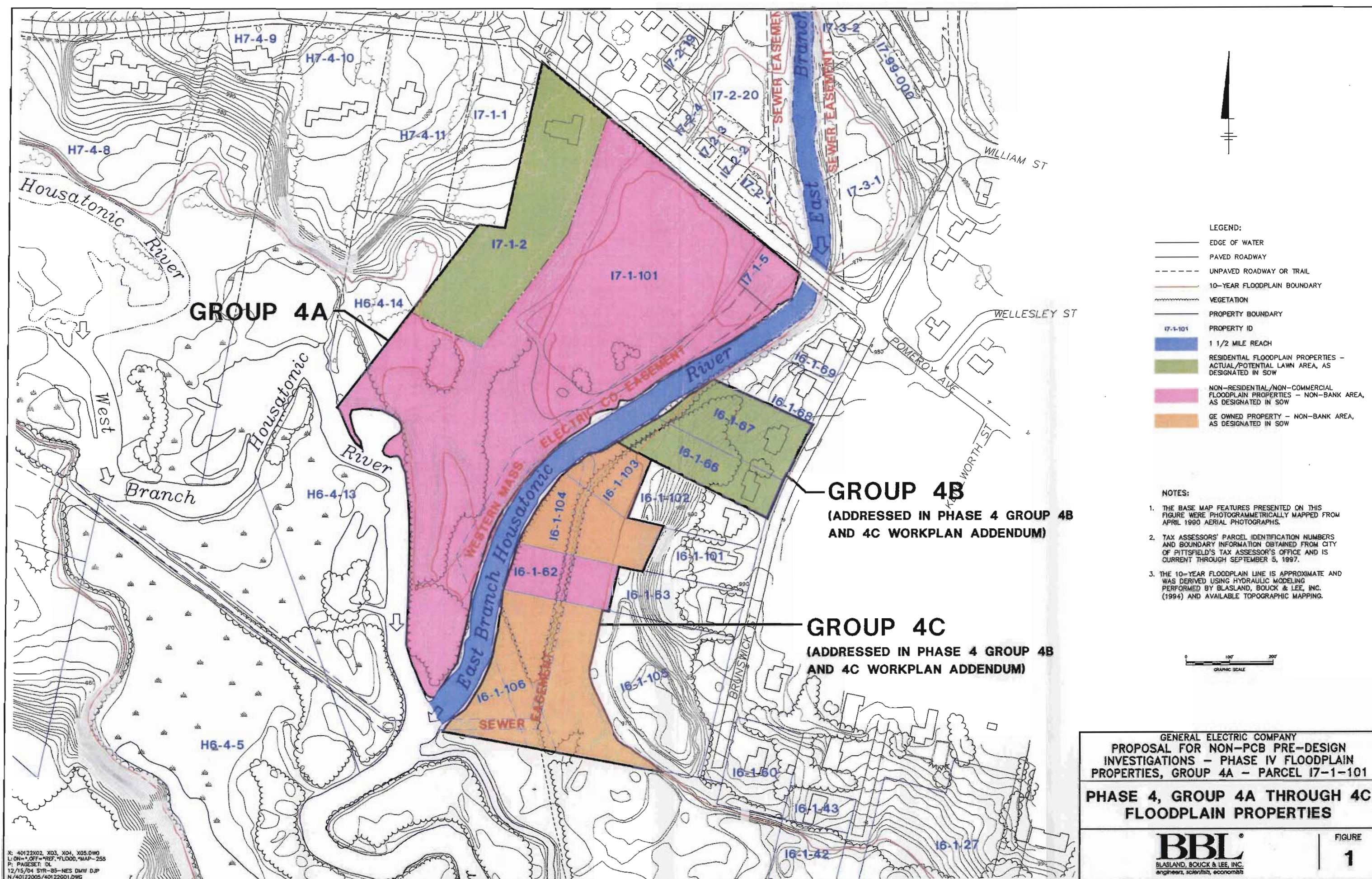
Organics (semivolatiles, pesticides, herbicides, dioxin/furans)

- J - Estimated Value.
- R - Rejected.

Inorganics

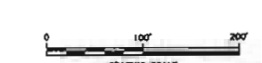
- J - Estimated Value.

Figures



- LEGEND:
- EDGE OF WATER
 - PAVED ROADWAY
 - UNPAVED ROADWAY OR TRAIL
 - 10-YEAR FLOODPLAIN BOUNDARY
 - VEGETATION
 - PROPERTY BOUNDARY
 - PROPERTY ID
 - 1 1/2 MILE REACH
 - RESIDENTIAL FLOODPLAIN PROPERTIES - ACTUAL/POTENTIAL LAWN AREA, AS DESIGNATED IN SOW
 - NON-RESIDENTIAL/COMMERCIAL FLOODPLAIN PROPERTIES - NON-BANK AREA, AS DESIGNATED IN SOW
 - GE OWNED PROPERTY - NON-BANK AREA, AS DESIGNATED IN SOW

- NOTES:
- THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 - TAX ASSESSORS' PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 5, 1997.
 - THE 10-YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.



GENERAL ELECTRIC COMPANY
PROPOSAL FOR NON-PCB PRE-DESIGN
INVESTIGATIONS - PHASE IV FLOODPLAIN
PROPERTIES, GROUP 4A - PARCEL 17-1-101

**PHASE 4, GROUP 4A THROUGH 4C
FLOODPLAIN PROPERTIES**

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
1

X: 40122X02, X03, X04, X05.DWG
L: ON=*, OFF=*, REF=*, FLOOD, MAP-255
P: PAGESET, DL
12/15/04 SYR-85-NES DAW D.P
N/40122005/40122601.DWG

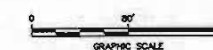


LEGEND

- 970 — TOPOGRAPHIC CONTOUR
- - - - - APPROXIMATE PARCEL BOUNDARY
- - - - - 10-YEAR FLOODPLAIN BOUNDARY
- APPROXIMATE HORIZONTAL LIMITS OF AVERAGING AREA
- 17-1-2** RESIDENTIAL PROPERTY PARCEL ID
- 17-1-5** NON-RESIDENTIAL PROPERTY PARCEL ID
- F0219203 EXISTING SOIL BORING LOCATION
- 4A-SB-19 PROPOSED APPENDIX IX+3 SURFACE SOIL SAMPLE LOCATION
- 4A-SB-24 PROPOSED APPENDIX IX+3 SOIL BORING LOCATION
- ▨ AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
- BOUNDARY OF FLOODPLAIN PROPERTIES (SEE NOTE 4)

FIGURE NOTES:

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM AERIAL PHOTOGRAPHS DATED APRIL 1990.
2. PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION.
3. THE 10-YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.
4. LIMIT OF EPA RESPONSE ACTIONS ASSOCIATED WITH THE 1 1/2 MILE REACH IS BASED ON ELECTRONIC FILE RECEIVED FROM EPA ON NOVEMBER 10, 2004.
5. SAMPLE LOCATIONS ARE APPROXIMATE.



GENERAL ELECTRIC COMPANY
 PROPOSAL FOR NON-PCB PRE-DESIGN
 INVESTIGATIONS - PHASE IV FLOODPLAIN
 PROPERTIES, GROUP 4A - PARCEL 17-1-101
 SUMMARY OF EXISTING AND PROPOSED
 APPENDIX IX+3 SOIL SAMPLING
 LOCATIONS FOR GROUP 4A

BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers, scientists, economists

FIGURE

3